

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>IN RE:</b>	)	<b>CASE NO: 19-44253-659</b>
<b>JIMMIE LEE BROWN</b>	)	<b>Chapter 13</b>
	)	
	)	<b>Trustee's Objection to Confirmation</b>
	)	<b>Original Confirmation Hearing set for :</b>
<b>Debtor</b>	)	<b>August 29, 2019 11:00 am</b>

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. Debtor should file an amended Schedule I to reflect current employment and income.
2. The set monthly payments to be made by the Trustee exceed the plan payment.
3. The plan does not contain enough funds to pay secured and priority creditors in full and pay the amount guaranteed to general unsecured creditors (if any). 11 U.S.C. §§ 1322(a)(2) and 1325(a)(5)(B)(ii). The approximate amount of the shortfall is \$156,000. See objection 4 below.
4. Plan fails to address two scheduled secured debts. Although they are described in paragraph 5.1, it does not instruct trustee not to pay them.
5. Trustee objects to excess claimed homestead exemption in residence
6. A claim has been filed for an unscheduled 2018 Ford.
7. Schedules A/B and D fail to provide make of vehicle son drives.
8. Schedule I omits food stamps.
9. Trustee requests 2016 state and federal tax returns.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: August 02, 2019

OBJCONF--KLW

/s/ Kathy Wright

Kathy Wright MO31047

Attorney for Trustee

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on August 02, 2019, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on August 02, 2019.

JIMMIE LEE BROWN  
4624 BEHLMANN ESTATES LANE  
FLORISSANT, MO 63034

/s/ Kathy Wright

Kathy Wright MO31047